

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

TERRY DANIEL,

Plaintiff,

vs.

CIVIL ACTION NO.
CV-00-M-400-E

CITY OF LANETT FIRE and
EMS DEPARTMENT,

Defendant.

* * * * *

DEPOSITION OF TERRY L. DANIEL, taken
pursuant to stipulation and agreement before Danny
D. Tyler, Certified Shorthand Reporter and Notary
Public in and for the State of Alabama at Large, in
the Law Offices of Nix, Holtsford, Gilliland, Lyons
& Higgins, Suite 300, 300-A Water Street,
Montgomery, Alabama, on the 29th day of September,
2000, commencing at approximately 10:15 a.m.

* * * * *



1 the chief when Chief Cobb left?

2 A. Do I -- Oh, yeah.

3 Q. Okay. Have you ever had any problems with
4 Chief Brown?

5 A. Chief Brown was my captain most -- Since
6 I've been at Station Two, Chief Brown has
7 been one of my primary captains.

8 Q. Throughout the time you have been with the
9 city?

10 A. Since I have been back to Station Two, I
11 worked under Chief Brown probably more than
12 anybody.

13 Q. And how would you describe your relationship
14 with Chief Brown?

15 A. Real good.

16 Q. Real good?

17 A. Yes, sir, because we wasn't -- Yeah. I
18 would say because me and him hadn't -- I say
19 good. He ain't never written me up, never
20 got on me for poor job performance or
21 nothing like that, and we worked together on
22 fire calls, investigations. So I would say
23 it a pretty good working relationship.